

Received
in chambers of:
U.S. District Judge
DORA L. IRIZARRY
JUL 02 2012

June 29, 2012

D/R

BY REGULAR MAIL

The Honorable Dora Irizarry
United States District Judge for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ JUL 10 2012 ★

Re: *Web-adviso and J. Taikwok Yung v. Donald J. Trump*,

Civil Action No.: 1:11-cv-1413 (DLI) (VVP)

BROOKLYN OFFICE

Dear Honorable Judge Dora Irizarry:

Since the Pro-se plaintiff was not furnished with a complete list of correct documents relating to the list of authorities (See **EXHIBIT C: List of Authorities in Memorandum**) (Pursuant to EDNY Local Rule 7.2) by the Defendant party and the Defeendant's counsel (only 6 of the 19 listed were provided), the Pro-se Plaintiff can only provide a limited response and reiteration of some key points.

Incomplete List of Authorities Docs were provided (Violating Local Rule 7.2 for the 3rd Time)

The opposing counsel (Eric Kittay and James Weinberger) only provided an email with 9 attached Westlaw Documents (See **EXHIBIT A: of the email with attachments**) and (See **EXHIBIT B: Printed First Page of Westlaw Docs**). Of the 9 attached Westlaw docs in the email, only 6 were referenced cases in the defendant's memorandum, the others were not even referenced and unrelated. In the defendant's MEMORANDUM IN SUPPORT OF DEFENDANT/COUNTERCLAIM PLAINTIFF DONALD J. TRUMP'S MOTION FOR PARTIAL SUMMARY JUDGMENT, the table of authorities listed 19 referenced cases for authority (See **EXHIBIT C: Memorandum's Table of Authorities**).

Some reasons for their willful act to omit and not to provide the pro-se the other referenced

cases are:

1. the opposing counsel are misquoting those authorities.
2. the referenced cases have the outcome that favor the litigant of the original domain owner.
3. there are significant materials and arguments that would absolutely help the position of the pro-se litigant.

Because the opposing counsels (James Weinberger and Leo Kittay) know their submitted docs are an incompetent "hack" job of misquotes and misrepresentations to harm the rightful positions and arguments of the pro-se litigant and to fool the court, the pro-se plaintiff respectfully ask the court to seek significant and meaningful sanctions against the defendant party and their counsels. (The opposing counsels first broke the EDNY Local Rule 7.2 during proceedings with Honorable Judge Viktor V. Pohorelsky (VVP)).

Laches Defense

The Plaintiff had forward the Laches defense in previously submitted docs and reasserts this legitimate defense against the frivolous arguments by the incompetent opposing counsel because of the following reasons:

1. the server host of the at-issue domains are located in United States. **(See EXHIBIT D: whois BYET.ORG info)**
2. the language of the website is in American English with popular American vernacular slang.
3. the registration postal addresses for administrative and technical contact are all in the United States **(SEE EXHIBIT E: whois info of at-issue domains)**

The defendant's argument that the Laches defense does not apply clearly shows they are out-of-touch and ignorantly incompetent to the understanding of the technical side of this matter and dispute.

Recognition that the nature of Internet Technology has changed

The pro-se Plaintiff respectfully ask the court to recognize the fact that the Internet and its contributing technologies have improved and changed in a way that allows for more innovative ways to accomplish many new things on an Internet browser.

Because of the newer nature of the consumed technologies,, the Plaintiff respectfully ask that the reference cases for authorities before 2007 (Web 2.0) be regarded as irrelevant and outdated.

Some of the reasons to support this includes.

1. the at-issue websites consumes third party web APIs (Application Programming Interface) and RSS News headline aggregation (Real Simple Syndication) technologies that help aggregate and render content which was non-existent a few of years ago.
2. the newer technologies consumed allows for a mix of hosted and original content to be display side-by-side.

Conclusion

With the aforementioned reasons along with previously submitted docs and arguments, the pro-se Plaintiff respectfully ask the court to find in favor of the pro-se litigant and dismiss all frivolous claims of the Defendant party.

Respectfully Submitted,



J. Taikwok Yung (sporting202@yahoo.com)

556 E 88th St.
Brooklyn, NY 11236

646.309.8421

cc: James Weinberger (by email and Regular Mail)

INDEX OF EXHIBITS

EXHIBIT A: showing email with attachments of incomplete documents of the list of referenced authorities

EXHIBIT B: Printed First Page of attached documents from the email in EXHIBIT A

EXHIBIT C: Def's Memorandum's Table of Authorities)

EXHIBIT D: whois info hosting provider BYET.ORG

EXHIBIT E: whois info of at-issue domains

EXHIBIT A

FROM: Leo Kittay

TO: M.M.

CC: James Weinberger +

Tuesday, April 17, 2012, 11:59 PM

Dear Mr. Yung,

Please see attached cases, sent pursuant to Local Rule 7.2

Kind regards,

Leo

Leo Kittay

Fross Zehnick Lehman & Zissu, P.C.

866 United Nations Plaza

New York, NY 10017

(212) 813-8210

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9 Attached files | 1.0MB

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EXHIBIT B

Not Reported in F.Supp.2d, 2005 WL 1164073 (S.D.N.Y.), 2005-1 Trade Cases P 74,795
(Cite as: 2005 WL 1164073 (S.D.N.Y.))

United States District Court,
S.D. New York.
DE BEERS LV TRADEMARK LIMITED and De Beers LV Limited, Plaintiffs,
v.
DEBEERS DIAMOND SYNDICATE INC. and Marvin Rosenblatt Defendants.

No. 04 Civ.4099(DLC).
May 18, 2005.

Marie V. Driscoll, Barbara A. Solomon, James D. Weinberger, Fross Zelnick Lehrman & Zissu, P.C., New York, New York, for Plaintiffs.

Paul R. Levenson, Steven M. Kaplan, Ashima Aggarwal, Kaplan & Levenson LLP, New York, New York, for Defendants.

OPINION AND ORDER

COTE, J.

*1 Plaintiffs De Beers LV Limited ("De Beers LV") and De Beers LV Trade Mark Limited (De Beers LV Trade Mark") bring claims against DeBeers Diamond Syndicate Inc. ("Syndicate") and its president, Marvin Rosenblatt ("Rosenblatt"). They allege a violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), and unfair competition and trademark dilution violations under New York law.

This Opinion addresses plaintiffs' motions to strike the affirmative defenses of unclean hands and lack of standing and considers plaintiffs' motions to dismiss defendants' counterclaims for a declaratory judgment and alleging conspiracy in restraint of trade under the Sherman Antitrust Act. The counterclaims name the plaintiffs and several additional counterclaim defendants: De Beers Consolidated Mines, Limited ("Consolidated Mines"); De Beers Centenary AG ("Centenary"); and De Beers Trademarks Limited ("Trademarks") (collectively, the "Additional Counterclaim Defendants"). This Opinion also addresses defendants' motion to join the Additional Counterclaim Defendants as necessary parties to the action under Rule 19, Fed.R.Civ.P.

For the reasons stated below, the affirmative defense of unclean hands is stricken. The motions to strike the affirmative defense of lack of standing and to dismiss the declaratory judgment counterclaim are denied. The motion to dismiss Sherman Antitrust Act counterclaim is granted. Defendants' motion for joinder is denied.

Background

The following facts are taken from the allegations in the complaint, unless otherwise noted. Plaintiffs were incorporated in the United Kingdom in January 2002. The entities were created as a joint venture between the unspecified "owner of rights in De Beers" and luxury goods producer LVMH Moët Hennessy Louis Vuitton "to further exploit use of the DE BEERS trade identity in the retail diamond and luxury goods area in the United States and elsewhere." Plaintiff De Beers LV has been assigned the right to use DE BEERS in the United States as a trademark and service mark for diamonds, jewelry, and other luxury goods.^{FNI} Plaintiff De Beers LV Trade Mark, a wholly owned subsidiary of De Beers LV, owns the trademark for and has filed applications to register the DE BEERS mark in the United States for luxury goods such as watches and clocks and for "retail store services."

FNI. The complaint does not indicate whether De Beers LV has filed applications to register the trademark for these purposes.

The DE BEERS name has been used for over a century in connection with the diamond mining and distribution

Not Reported in F.Supp.2d, 2007 WL 102988 (S.D.N.Y.)
(Cite as: 2007 WL 102988 (S.D.N.Y.))

Only the Westlaw citation is currently available. Not for Publication

United States District Court,
S.D. New York.
GENERAL MEDIA COMMUNICATIONS, INC., Plaintiff,
v.
CRAZY TROLL, LLC and Gene Heu, Defendants.

No. 06 Civ. 40581 LAKFM.
Jan. 16, 2007.

MEMORANDUM DECISION AND ORDER

MAAS, Magistrate J.

I. Introduction

*1 This case arises out of a dispute between plaintiff General Media Communications, Inc. ("GMCI"), which publishes Penthouse Magazine and exploits the Penthouse name through a variety of related means, and defendant Crazy Troll, LLC ("Crazy Troll"), which acquired the internet domain name "penthouseboutique.com" after GMCI's bankruptcy trustee permitted it to lapse. When Crazy Troll's registration and use of the name came to GMCI's attention, GMCI instituted a proceeding with the National Arbitration Forum ("NAF") under the Uniform Domain Name Dispute Resolution Policy ("UDRP") to retrieve its penthouseboutique.com domain name. Thereafter, an NAF "panel," consisting of a single panelist, reissued a decision ("UDRP Decision") in which it declined to transfer the domain name to GMCI. The panel further found in the UDRP Decision that GMCI had acted in bad faith in bringing the proceeding and had engaged in reverse domain name hijacking.

Although the complaint in this action contains several claims for relief, GMCI has moved pursuant to Rule 56 of the Federal Rules of Civil Procedure for partial summary judgment solely on its fifth claim, which seeks a declaration that it did not initiate or pursue the UDRP proceeding in bad faith or engage in reverse domain name hijacking. The parties have consented to my jurisdiction to decide this motion, which is granted (essentially without opposition) for the reasons set forth below.

II. Facts

GMCI is a corporation duly organized and existing under the laws of the State of New York, doing business at 2 Penn Plaza, New York, New York. GMCI and its affiliates own and operate penthouse.com, a leading adult entertainment website, and have licensed their marks for a broad array of products and services, including retail stores, clothing, and the website penthousestore.com, an e-commerce site that provides adult video entertainment and other products.

Defendant Gene Heu ("Heu") is the principal of Crazy Troll, a New York limited liability company with its principal place of business at 184 Coolidge Drive, East Meadow, New York. CrazyTroll.com is listed on various internet registrar databases as the registrant and administrative contact for penthouseboutique.com. (Heu and Crazy Troll are hereinafter referred to together as the "defendants.")

* Since in or around 1969, GMCI and its predecessors in interest have published Penthouse Magazine, which has had a national monthly circulation of approximately 369,000, and a readership of approximately 3.5 million.

In 2003, GMCI's former parent, General Media, Inc. ("GMI"), filed for bankruptcy. After a reorganization in 2004, GMI emerged as Penthouse Media Group Inc. ("PMG") under the control of a group of private investors. One of PMG's subsidiaries is GMCI.

Not Reported in F.Supp., 1989 WL 201651 (D.Hawai'i), 13 U.S.P.Q.2d 1975
(Cite as: 1989 WL 201651 (D.Hawai'i))

United States District Court, D. Hawai'i.
SURF LINE HAWAII, LTD., Plaintiff,
v.
Kevin R. AHAKUELO, dba Hawaiian Jam, Defendant.

CIV. No. 88-00090 SPK.
Sept. 22, 1989.

John Moon, Brian Yomono, Robert Kim, Moon, O'Connor, Tam & Yuen, Honolulu, Hawaii, Anthony Fletcher, Hunton & Williams, New York City, for plaintiff.

D. Barclay Bryan, Honolulu, Hawaii, for defendant.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

SAMUEL P. KING, Senior District Judge.

INTRODUCTION:

*1 On February 17, 1988, plaintiff Surf Line Hawaii, Ltd. ("Surf Line"), a Hawaii corporation, filed its complaint against defendant Kevin R. Ahakuelo ("Ahakuelo"), doing business as HAWAIIAN JAM, seeking injunctive relief and damages for alleged infringement of its JAMS trademark. Surf Line amended its complaint twice. Ahakuelo set forth counterclaims against Surf Line.

On July 25, 1989, this court severed Surf Line's claims from Ahakuelo's counterclaims, and ordered the trial on the counterclaims to be reset after the disposition on Surf Line's complaint.

On August 9, 1989, this court entered a second order, which, among other things, granted Surf Line's motion for leave to file a third amended and supplemental complaint. Via this third amended complaint, Surf Line was to drop its claims for monetary damages and any other legal relief, such that the complaint prayed exclusively for an injunction and other assorted relief cognizable in equity.

In light of Surf Line's abandonment of its claims for legal relief, this court granted Surf Line's motion to strike Ahakuelo's demand for jury trial in connection with Surf Line's claims for equitable relief.

Pursuant to the August 9, 1989 order, Surf Line filed its third amended and supplemental complaint, which adhered to the guidelines set forth in said order.

Accordingly, a non-jury trial commenced on August 14, 1989. Anthony L. Fletcher and Brian K. Yomono appeared on behalf of Surf Line. D. Barclay Bryan appeared on behalf of Ahakuelo.

The court has carefully considered the memoranda submitted by counsel, the testimony adduced at trial, and the exhibits admitted into evidence, and being fully advised in the premises, enters the following Findings of Fact and Conclusions of Law:

Findings of Fact:

1. Surf Line is a Hawaii corporation with its principal place of business at 1451 Kalani Street, Honolulu, Hawaii.
2. Ahakuelo is a resident of the city and county of Honolulu, Hawaii.

Not Reported in F.Supp.2d, 2004 WL 1620950 (S.D.N.Y.)
(Cite as: 2004 WL 1620950 (S.D.N.Y.))

Only the Westlaw citation is currently available.

United States District Court,
S.D. New York.
TCPIP HOLDING CO., Plaintiff,
v.
HAAR COMMUNICATIONS INC. and Richard S. Haar, Defendants.

No. 99 Civ. 1825(RCC).
July 19, 2004.

MEMORANDUM OPINION & ORDER

CASEY, J.

*1 TCPIP Holding Co. ("Plaintiff"), operator of the children's clothing franchise "The Children's Place," sued Haar Communications Inc. and Richard S. Haar ^{FN1} (collectively, "Defendants") for cybersquatting, trademark infringement, unfair competition, and trademark dilution after Defendant registered the domain name, "thechildrens-place.com" and sixty-six other domain names containing variations on the words "children" and "place." On May 27, 1999, the Court preliminarily enjoined Defendants from using these sixty-seven domain names and generally from using any "colorable imitation" of Plaintiff's mark. On December 9, 1999, the Court modified its earlier order to specifically enjoin Defendants from using fourteen additional domain names. On February 28, 2001, the Second Circuit Court of Appeals affirmed the preliminary injunction as it related to several of the domain names that were "so clearly similar to 'The Children's Place' that the differences are hardly noticeable." See *TCPIP Holding Co. v. Haar Communications Inc.*, 244 F.3d 88, 102 n. 11 (2d Cir.2001). The Court of Appeals remanded the case for further proceedings and Plaintiff now moves for summary judgment. For the reasons set forth below, the motion is GRANTED.

^{FN1}. As a general matter, Mr. Haar, the sole director, officer and employee of Haar Communications Inc., would not typically be personally liable for the conduct of his corporation. However, this general rule is abrogated when an individual actively and knowingly causes trademark infringement. See *Fugazy Int'l Travel Group v. Stargazer, Ltd.*, No. 02 Civ. 3373, 2003 WL 115220, at *2 (S.D.N.Y. Jan. 10, 2003); *Mattel, Inc. v. Internet Dimensions Inc.*, No. 99 Civ. 10066, 2000 WL 973745, at *9 (S.D.N.Y. July 13, 2000). Accordingly, for the reasons set forth below, Mr. Haar may be held personally liable for Haar Inc.'s conduct.

BACKGROUND

Pursuant to Local Civil Rule 56.1, Defendants were required to include a separate short and concise statement of any material facts as to which they contended there exists a genuine issue. In the absence of such a statement, all material facts set forth in Plaintiff's 56.1 statement may be deemed admitted. See S.D.N.Y. Local Civil R. 56.1(b), (c); *Giannullo v. City of New York*, 322 F.3d 139, 140 (2d Cir.2003); *United States v. All Right, Title & Interest in Real Property & Appurtenances*, 77 F.3d 648, 657-58 (2d Cir.1996).

Defendants did not submit a controverting Rule 56.1 statement and thus failed to comply with Local Civil Rule 56.1.^{FN2} Nevertheless, because Richard Haar appears *pro se* the Court has overlooked the technical deficiency of the submission, see *Zeno v. Cropper*, 650 F.Supp. 138, 139 (S.D.N.Y.1986), and has viewed the record in the following manner: if there existed some dispute between Plaintiff's Rule 56.1 statement and Haar's papers, the facts have been viewed in the light most favorable to Defendants. On the other hand, any facts in Plaintiff's Rule 56.1 statement which remain uncontroverted by Haar's papers have been accepted as true. See *Dusaneko v. Maloney*, 726 F.2d 82, 84 (2d Cir.1984); see also *Mazza v. City of New York*, No. 98 Civ. 2342, 1999 WL 1289623, at *1 (E.D.N.Y. July 13, 1999).

Not Reported in F.Supp., 1997 WL 133313 (S.D.N.Y.), 65 BNA USLW 2662, 42 U.S.P.Q.2d 1430
(Cite as: 1997 WL 133313 (S.D.N.Y.))

United States District Court,
S.D. New York.

PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., Plaintiff,
v.
Richard BUCCI, d/b/a Catholic Radio Defendant.

No. 97 Civ. 0629 (KMW).
March 24, 1997.

OPINION & ORDER

KIMBA M. WOOD, District Judge.

*1 Plaintiff Planned Parenthood Federation of America, Inc. ("Planned Parenthood") has moved to preliminarily enjoin defendant Richard Bucci ("Bucci"), doing business as Catholic Radio, from using the domain name "plannedparenthood.com," and from identifying his web site on the Internet under the name "www.plannedparenthood.com." The Court held a hearing on February 20, 1997 and February 21, 1997,^{FN1} and now issues the preliminary injunction sought by Planned Parenthood.

FN1. The Court held a hearing on plaintiff's request for a temporary restraining order on February 5, 1997.

I. Undisputed Facts

The parties do not dispute the following facts. Plaintiff Planned Parenthood, founded in 1922, is a non-profit, reproductive health care organization that has used its present name since 1942. Plaintiff registered the stylized service mark "Planned Parenthood" on the Principal Register of the United States Patent and Trademark Office on June 28, 1955, and registered the block service mark "Planned Parenthood" on the Principal Register of the United States Patent and Trademark Office on September 9, 1975. Plaintiff's 146 separately incorporated affiliates, in 48 states and the District of Columbia, are licensed to use the mark "Planned Parenthood." Plaintiff expends a considerable sum of money in promoting and advertising its services. The mark "Planned Parenthood" is strong and incontestable.

Plaintiff operates a web site at "www.ppfa.org," using the domain name "ppfa.org." Plaintiff's home page offers Internet users resources regarding sexual and reproductive health, contraception and family planning, pregnancy, sexually transmitted diseases, and abortion, as well as providing links to other relevant web sites. In addition, plaintiff's home page offers Internet users suggestions on how to get involved with plaintiff's mission and solicits contributions.^{FN2}

FN2. Plaintiff's Houston affiliate owns the domain name "plannedparenthood.org," and is in the process of transferring that domain name to plaintiff. Tr. 2/20/97 at 14.

Defendant Bucci is the host of "Catholic Radio," a daily radio program broadcast on the WVOA radio station in Syracuse, New York. Bucci is an active participant in the anti-abortion movement. Bucci operates web sites at "www.catholicradio.com" and at "lambsofchrist.com." On August 28, 1996, Bucci registered the domain name "plannedparenthood.com" with Network Solutions, Inc. ("NSI"), a corporation that administers the assignment of domain names on the Internet. After registering the domain name, Bucci set up a web site and home page on the Internet at the address "www.plannedparenthood.com."

Internet users who type in the address "www.plannedparenthood.com," or who use a search engine such as Yahoo or Lycos to find web sites containing the term "planned parenthood," can reach Bucci's web site and home page.

Slip Copy, 2010 WL 521117 (S.D.N.Y.), 93 U.S.P.Q.2d 1932
(Cite as: 2010 WL 521117 (S.D.N.Y.))

United States District Court,
S.D. New York.
WEBADVISO, J. Taikwok Yung, Plaintiff,
v.
BANK OF AMERICA CORP., Merrill Lynch, Defendants.

No. 09 Civ. 5769(DC).
Feb. 16, 2010.

J. Taikwok Yung, Brooklyn, NY, pro se.

condon & Forsyth LLP, by: John Maggio, Esq. New York, NY, and Womble Carlyle Sandridge & Rice, PLLC, by:
Charles A. Burke, Esq., Jacob S. Wharton, Esq., Winston-Salem, NC, for Defendants.

MEMORANDUM DECISION

CHIN, District Judge.

*1 In this case, plaintiff J. Taikwok Yung, suing herein as “Webadviso, J. Taikwok Yung,” seeks a judgment declaring that his use of the domain names “bofaml.com” and “mlbofa.com” does not violate the rights of defendants Bank of America Corporation (“Bank of America”) and Merrill Lynch & Co., Inc. (“Merrill Lynch”), sued herein, respectively, as “Bank of America Corp.” and “Merrill Lynch.”

On December 31, 2009, I issued a memorandum decision setting forth my findings of fact and conclusions of law in connection with my granting of defendants' motion for a preliminary injunction. Webadviso v. Bank of Am. Corp., No. 09 Civ. 5769(DC), 2009 WL 5177997 (S.D.N.Y. Dec. 31, 2009). At the conclusion of my memorandum decision, I ordered plaintiff to show cause why summary judgment should not be granted against him dismissing his complaint and awarding defendants the relief requested in their answer and counterclaims. *Id.* at *5. I directed plaintiff to provide, in his opposition papers, “whatever evidence and arguments he has to support his claims and to oppose defendants' counterclaims,” and to “identify any genuine issues of material fact that he believes warrant a trial.” *Id.*

Plaintiff responded in a timely manner, by filing a document entitled “Motion To Show Cause.” In it, plaintiff asks the Court to deny summary judgment and to order the commencement of discovery. I accept the “Motion To Show Cause” as plaintiff's opposition to summary judgment.

Summary judgment is hereby granted in favor of defendants dismissing the complaint and awarding them the relief requested in their answer and counterclaims.

First, as set forth in my December 31st memorandum decision, the substantial evidentiary record provided by the parties on defendants' motion for a preliminary injunction showed clearly that defendants are likely to succeed on their cybersquatting claim. That same evidence shows, with respect to the merits, that defendants are entitled to judgment as a matter of law.

Second, that record includes plaintiff's own statements and admissions. In his complaint, plaintiff describes himself as a “domainer” who seeks to “acquire high value domain names and park them with domain parking service providers to generate pay-per-click revenue” or to build websites. (Compl.¶ [3.]). In an e-mail dated March 27, 2009, from plaintiff to counsel for defendants, plaintiff suggested he would be willing to sell the “bofaml.com” domain name, and suggested it would “fetch near 7 figures” on the open market. (Ferrario Aff. ¶¶ 4, 5 & Ex. 2).

Not Reported in F.Supp.2d, 2003 WL 22023946 (S.D.N.Y.)
 (Cite as: 2003 WL 22023946 (S.D.N.Y.))

Only the Westlaw citation is currently available.

United States District Court,
 S.D. New York.
 Gianni VERSACE, S.p.A., Plaintiff,
 v.
 Alfredo VERSACE et al., Defendants.

No. 01Civ.9645(PKL)(THK).
 Aug. 27, 2003.

Owner of incontestable trademarks using a surname as the "focal point" of the designation sought legal and equitable relief for alleged trademark infringement. Upon owner's motion for partial summary judgment, the District Court, Leisure, J., held that: (1) owner was entitled to injunctive relief on its trademark infringement claim under Lanham Act; (2) genuine issue of material fact existed as to whether there was actual consumer confusion or deception resulting from trademark infringement violation, precluding summary judgment in favor of owner on claim for damages; and (3) doctrines of res judicata and collateral estoppel did not preclude defendant from litigating owner's claims.

Motion denied in part and granted in part.

West Headnotes

[1] Federal Civil Procedure 170A 2547.1

170A Federal Civil Procedure

170AXVII Judgment

170AXVII(C) Summary Judgment

170AXVII(C)3 Proceedings

170Ak2547 Hearing and Determination

170Ak2547.1 k. In general. Most Cited Cases

Facts contained in movant's statement accompanying its motion for summary judgment would be deemed admitted to extent they were supported by admissible evidence where defendants either did not file counter-statement or respond to summary judgment motion. Local Civil Rule 56.1(c).

[2] Federal Civil Procedure 170A 2547.1

170A Federal Civil Procedure

170AXVII Judgment

170AXVII(C) Summary Judgment

170AXVII(C)3 Proceedings

170Ak2547 Hearing and Determination

170Ak2547.1 k. In general. Most Cited Cases

An affidavit was not sufficient to comply with requirement to file a memorandum of law in opposition to summary judgment motion. Local Rule 7.1.

Not Reported in F.Supp.2d, 2006 WL 845509 (E.D.N.Y.)
 (Cite as: 2006 WL 845509 (E.D.N.Y.))

Only the Westlaw citation is currently available.ON LINE Publication ONLY

United States District Court,
 E.D. New York.
 FREEDOM CALLS FOUNDATION, a New York corporation, Plaintiff,
 v.
 Edward BUKSTEL, Defendant.
 Edward Bukstel, Counterplaintiff/Third-Party Plaintiff,
 v.
 Freedom Calls Foundation, a New York corporation, Counterdefendant,
 and
 John B. Harlow II, Kate Green, Warren Sherman, Daniel Kurtz and J.J. Leitner, Third-Party Defendants.

No. 05CV5460(SJ)(VVP).
 March 3, 2006.

Holland & Knight LLP, New York, NY, By: Christelette Angelika Hoey, Tamara F. Carmichael, for Plaintiff.

Edward Bukstel, Blue Bell, PA, Defendant pro se.

MEMORANDUM & ORDER

JOHNSON, Senior District Judge:

*1 Presently before the Court is Plaintiff-Counterdefendant Freedom Calls' ("Plaintiff") motion for a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, to restrain Defendant-Counterplaintiff-Third-Party Plaintiff Edward Bukstel ("Defendant"),^{FN1} a former officer, employee and director of Plaintiff, from engaging in ongoing acts of unfair competition and cybersquatting in violation of the Lanham Act, 15 U.S.C. § 1051 et seq., as well as related and independent violations of New York state statutory and common law. Plaintiff also moves this Court for leave to file an amended complaint, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.

FN1. Defendant was also the named plaintiff in *Bukstel v. Harlow et al.*, Docket No. 05 CV 5996, which was pending in the United States District Court for the Eastern District of Pennsylvania ("Pennsylvania Federal Court"). In that case, Defendant alleged that Plaintiff and its current directors are liable for retaliatory termination, fraud, embezzlement, negligence, breach of contract, defamation, and breach of fiduciary responsibilities. *See* Complaint, *Bukstel v. Harlow et al.*, Docket No. 05 CV 5996 (E.D.Pa. Nov. 15, 2005). On February 2, 2006, the Pennsylvania Federal Court entered an order of dismissal for the *Bukstel v. Harlow et al.* action, upon Defendant's request.

Also before this Court is Defendant's motion for a temporary restraining order ("TRO"), preliminary injunction, and appointment of a receiver. Defendant seeks to enjoin and restrain Plaintiff's directors from (1) using the business e-mail account assigned to Defendant while he was affiliated with Plaintiff to distribute misleading and fraudulent tax documentation to Plaintiff's donors and patrons and (2) falsifying tax returns, perpetuating fraud, and misappropriating assets from Plaintiff.

BACKGROUND

Plaintiff, a New York not-for-profit corporation,^{FN2} was formed in 2003 to carry out the charitable mission of building a communications network which enables men and women on active duty in the United States Armed Forces to communicate free of charge from their base camps with their families at home. (Am.Compl.¶¶ 1, 5.)

EXHIBIT C

TABLE OF AUTHORITIES

CASES

<i>Brennan’s, Inc. v. Brennan’s Restaurant, L.L.C.</i> , 360 F.3d 125 (2d Cir. 2004).....	14-15
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<i>Celotex Corp. v. Catrett</i> , 477 U.S. 317 (1986).....	7
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<i>Clinique Laboratories, Inc. v. Dep Corp.</i> , 945 F. Supp. 547 (S.D.N.Y. 1996).....	19
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<i>ESPN, Inc. v. Quiksilver, Inc.</i> , 586 F. Supp. 2d 219 (S.D.N.Y. 2008).....	20
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<i>Frederick Warne & Co. v. Book Sales Inc.</i> , 481 F. Supp. 1191 (S.D.N.Y. 1979).....	9
<i>General Media Communications, Inc. v. Crazy Troll, L.L.C.</i> , No. 06 Civ. 40581 (LAK), 2007 WL 102988 (S.D.N.Y. Jan. 16, 2007).....	25
<i>Genesee Brewing Co. v. Stroh Brewing Co.</i> , 124 F.3d 137 (2d Cir. 1997).....	10
<i>Gruner + Jahr USA Publishing v. Meredith Corp.</i> , 91 F.2d 1072 (2d Cir. 1993)	13

<i>Gucci America, Inc. v. Gucci</i> , No. 07 Civ. 6820 (RMB), 2009 WL 8531026 (S.D.N.Y. Aug. 5, 2009).....	20
<i>Henry Siegel Co. v. M & R International Manufacturing Co.</i> , 4 U.S.P.Q.2d 1154, 1987 WL 123838 (T.T.A.B. 1987).....	14
<i>Home Box Office, Inc. v. Showtime/The Movie Channel, Inc.</i> , 832 F.2d 1311 (2d Cir. 1987).....	19
<i>International Bancorp, L.L.C. v. Societe Des Baines De Mer</i> , 192 F. Supp. 2d 467 (E.D. Va. 2002)	13
<i>La Societe Anonyme des Parfums Le Galion v. Jean Patou, Inc.</i> , 495 F.2d 1265 (2d Cir. 1974).....	8
<i>Lois Sportswear, U.S.A., Inc. v. Levi Strauss & Co.</i> , 799 F.2d 867 (2d Cir. 1986).....	9, 15
<i>Louis Vuitton Malletier v. Burlington Coat Factory Warehouse Corp.</i> , 426 F.3d 532 (2d Cir. 2005).....	13, 20
<i>Lucas Nursery & Landscaping, Inc. v. Grosse</i> , 359 F.3d 806 (6th Cir. 2004)	22
<i>McGregor-Doniger, Inc. v. Drizzle, Inc.</i> , 599 F.2d 1126 (2d Cir. 1979).....	18
<i>Morningside Group Ltd. v. Morningside Capital Group, L.L.C.</i> , 182 F.3d 133 (2d Cir. 1999).....	15, 18
<i>Nabisco v. Warner-Lambert Co.</i> , 32 F. Supp. 2d 690 (S.D.N.Y. 1999).....	7
<i>Omega S.A. v. Omega Engineering, Inc.</i> , 228 F. Supp. 2d 112 (D. Conn. 2002).....	13, 20
<i>Paddington Corp. v. Attiki Importers & Distributors, Inc.</i> , 996 F.2d 577 (2d Cir. 1993).....	12
<i>Park 'N Fly, Inc. v. Dollar Park & Fly, Inc.</i> , 469 U.S. 189 (1985).....	9, 11, 12
<i>Perfect Fit Industries, Inc. v. Acme Quilting Co.</i> , 618 F.2d 950 (2d Cir. 1980).....	20

EXHIBIT D

Username / Customer# Password Log In

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(480) 505-8877

WHOIS Domain Check

Domains	Hosting & Servers	Storage	Web Design	Generate Income	Email	SSL & Security	Auctions	My Account
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WHOIS search results for:

BYET.ORG

(Registered)

Is this your domain?

Add hosting, email and more.

Want to buy this domain?

Get it with our Domain Buy service.

Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not

guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator, a Registrar, or Affiliates except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D118948137-LROR
 Domain Name:BYET.ORG
 Created On:22-Mar-2006 00:41:41 UTC
 Last Updated On:08-Jun-2012 21:17:25 UTC
 Expiration Date:22-Mar-2013 00:41:41 UTC
 Sponsoring Registrar:NameNom, Inc. (R39-LROR)
 Status:OK
 Registrant ID:66d380d197de6ce6
 Registrant Name:Administrator Administrator
 Registrant Organization:FastNet Internet
 Registrant Street1:548 Market St. #11820
 Registrant Street2:
 Registrant Street3:
 Registrant City:California City
 Registrant State/Province:CA
 Registrant Postal Code:94104
 Registrant Country:US
 Registrant Phone:+1.7602846681
 Registrant Phone Ext.:
 Registrant FAX:+1.7602846681
 Registrant FAX Ext.:
 Registrant Email:abuse@byethost.org
 Admin ID:66d380d197de6ce6
 Admin Name:Administrator Administrator
 Admin Organization:FastNet Internet
 Admin Street1:548 Market St. #11820

Admin Street2:
 Admin Street3:
 Admin City:California City
 Admin State/Province:CA
 Admin Postal Code:94104
 Admin Country:US
 Admin Phone:+1.7602846681
 Admin Phone Ext.:
 Admin FAX:+1.7602846681
 Admin FAX Ext.:
 Admin Email:abuse@byethost.org
 Tech ID:66d380d197de6ce6
 Tech Name:Administrator Administrator
 Tech Organization:FastNet Internet
 Tech Street1:548 Market St. #11820
 Tech Street2:
 Tech Street3:
 Tech City:California City
 Tech State/Province:CA
 Tech Postal Code:94104
 Tech Country:US
 Tech Phone:+1.7602846681
 Tech Phone Ext.:
 Tech FAX:+1.7602846681
 Tech FAX Ext.:
 Tech Email:abuse@byethost.org
 Name Server:NS1.BYET.ORG
 Name Server:NS2.BYET.ORG

who.godaddy.com/whois.aspx?domain=byet.org&prog_id=GoDaddy

NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> byet.co	SAVE	\$12.99/yr
<input type="checkbox"/> byet.ve		\$14.99/yr
<input type="checkbox"/> byet.us	SAVE	\$3.99/yr
<input type="checkbox"/> byet.ca		\$12.99/yr
<input type="checkbox"/> byet.me	SAVE	\$7.99/yr
<input type="checkbox"/> byet.mobi	SAVE	\$6.99/yr
<input type="checkbox"/> byet.tv	SAVE	\$29.99/yr
<input type="checkbox"/> byet.cc		\$19.99/yr

Similar Premium Domains

<input type="checkbox"/> ClassBLicense.com		\$1,399.00*
<input type="checkbox"/> YourBestYearYet.com		\$699.00*
<input type="checkbox"/> ByeBid.com		\$2,088.00*
<input type="checkbox"/> ByeGroup.com		\$8,300.00*
<input type="checkbox"/> ByeByeBoss.com		\$4,188.00*

Similar Domains

<input type="checkbox"/> byets.org	SAVE	\$8.99/yr
<input type="checkbox"/> thebyet.org	SAVE	\$6.99/yr
<input type="checkbox"/> byetalle.org	SAVE	\$6.99/yr
<input type="checkbox"/> mybyet.org	SAVE	\$6.99/yr
<input type="checkbox"/> byetonline.org	SAVE	\$6.99/yr
<input type="checkbox"/> newbyet.org	SAVE	\$6.99/yr
<input type="checkbox"/> byetstore.org	SAVE	\$6.99/yr
<input type="checkbox"/> freebyet.org	SAVE	\$6.99/yr

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*Plus ICANN fee of \$0.18 per domain name year.

** CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

6/29/12

Name Server: NS2.BYET.ORG
 Name Server: NS3.BYET.ORG
 Name Server: NS4.BYET.ORG
 Name Server: NS5.BYET.ORG
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 DNSSEC: Unsigned

[See Underlying Registry Data](#)

Enter a domain name to search

.com

Go Daddy Global


Language: English



Country: United States



Currency: United States Dollar \$ (Transactional)

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My Account	Domain Search	Webmail	Telephone Support & Sales	About Us	Go Daddy, on the GO!	
My Renewals	Product Catalog	WHOIS search	Product Support	News Releases	iPhone Application	
My Upgrades	Go Daddy Gear	ICANN Confirmation	Discussion Forums	Careers	iPad Application	
Account Settings	Go Daddy Mobile	Affiliates	User Groups	Marketing Opportunities	Android Application	
Customer Information	Deals of the Day	Follow & Fan Us	Submit Support Ticket	Customer Testimonials	BlackBerry Application	
Order History		Legal	Site Suggestions	Security Center	Visit GoDaddyMobile.com	
Create Account		Commercial Contests	Report Abuse	.ME Scholarship	Sign Up for Special Offers	
		Site Map	Go Daddy Scoop	Round Up for Charity	Email Address	
				Inside Go Daddy		
				Go Daddy Tech Center		

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A

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EXHIBIT E

Username / Customer#

Password

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WHOIS Domain Check

Domains

Hosting & Servers

Storage

Web Design

Generate Income

Email

SSL & Security

Auctions

My Account

WHOIS search results for
TRUMPMUMBAI.COM
 (Registered)

**Is this your
 domain?**

Add hosting, email and more.

**Want to buy
 this domain?**

Get it with our Domain Buy service.

The data contained in GoDaddy.com, LLC's WHOIS database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registrant:**Web-adviso**

556 E 88th St.
 Brooklyn, New York 11236
 United States

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)

Domain Name: TRUMPMUMBAI.COM

Created on: 20-Sep-07

Expires on: 20-Sep-12

Last Updated on: 20-Sep-11

Administrative Contact:

Y., J. sporting202@yahoo.com

Web-adviso

556 E 88th St.
 Brooklyn, New York 11236
 United States
 +1.6463098421

Technical Contact:

Y., J. sporting202@yahoo.com

Web-adviso

556 E 88th St.
 Brooklyn, New York 11236
 United States
 +1.6463098421

Domain servers in listed order:

NS1.BYET.ORG

NS2.BYET.ORG

NS3.BYET.ORG

Registry Status: clientDeleteProhibited

Registry Status: clientRenewProhibited

Registry Status: clientTransferProhibited

Registry Status: clientUpdateProhibited

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NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:**Alternate TLDs**

<input type="checkbox"/> trumpmumbai.co	SAVE	\$12.99/yr
<input type="checkbox"/> trumpmumbai.info	SAVE	\$2.99*yr
<input type="checkbox"/> trumpmumbai.net	SAVE	\$8.99*yr
<input type="checkbox"/> trumpmumbai.org	SAVE	\$8.99*yr
<input type="checkbox"/> trumpmumbai.ws		\$14.99/yr
<input type="checkbox"/> trumpmumbai.us	SAVE	\$3.99/yr
<input type="checkbox"/> trumpmumbai.ca		\$12.99/yr
<input type="checkbox"/> trumpmumbai.biz	SAVE	\$5.99*yr

Similar Premium Domains

<input type="checkbox"/> MumbaiUniversities.com		\$649.00*
<input type="checkbox"/> MumbaiPhotos.com		\$949.00*
<input type="checkbox"/> MumbaiStreetMap.com		\$599.00*
<input type="checkbox"/> MumbaiShop.com		\$2,188.00*
<input type="checkbox"/> MumbaiInformation.com		\$3,388.00*
<input type="checkbox"/> MumbaiFriends.com		\$1,588.00*

Similar Domains

<input type="checkbox"/> trumpmumbais.com	SAVE	\$12.99*yr
<input type="checkbox"/> trumpmumbaisite.com	SAVE	\$12.99*yr
<input type="checkbox"/> mytrumpmumbai.com	SAVE	\$12.99*yr
<input type="checkbox"/> trumpmumbaionline.com	SAVE	\$12.99*yr
<input type="checkbox"/> newtrumpmumbai.com	SAVE	\$12.99*yr
<input type="checkbox"/> trumpmumbaisstore.com	SAVE	\$12.99*yr
<input type="checkbox"/> freetrumpmumbai.com	SAVE	\$12.99*yr
<input type="checkbox"/> trumpmumbainow.com	SAVE	\$12.99*yr

Domains available at Go Daddy Auctions®:

<input type="checkbox"/> acetump.com	Ends on: 9/27/2012 12:00:00 AM PDT	\$32,500.00*
<input type="checkbox"/> mumbaiusedcars.com	Ends on: 9/18/2012 12:00:00 AM PDT	\$4,500.00*
<input type="checkbox"/> triumphavana.com	Ends on: 9/15/2012 8:00:00 AM PDT	\$20,001.00*
<input type="checkbox"/> rosieltump.com	Ends on: 9/13/2012 6:00:00 AM PDT	\$10,000.00*
<input type="checkbox"/> mumbaisapphire.com	Ends on: 9/6/2012 12:00:00 AM PDT	\$10,000.00*
<input type="checkbox"/> triumphonresident.net	Ends on: 9/2/2012 12:00:00 AM PDT	\$20.00*

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*Plus ICANN fee of \$0.18 per domain name year.

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Username / Customer# Password Log In

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(480) 505-8877

WHOIS Domain Check

Domains Hosting & Servers Storage Web Design Generate Income Email SSL & Security Auctions My Account

WHOIS search results for:
TRUMPBEIJING.COM
(Registered)

Is this your
domain?
Add hosting, email and more.

Want to buy
this domain?
Get it with our Domain Buy service.

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registrant:
Web-adviso

556 E 88th St.
Brooklyn, New York 11236
United States

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
Domain Name: TRUMPBEIJING.COM
Created on: 20-Sep-07
Expires on: 20-Sep-12
Last Updated on: 20-Sep-11

Administrative Contact:
Y., J. sporting202@yahoo.com
Web-adviso
556 E 88th St.
Brooklyn, New York 11236
United States
+1.6463098421

Technical Contact:
Y., J. sporting202@yahoo.com
Web-adviso
556 E 88th St.
Brooklyn, New York 11236
United States
+1.6463098421

Domain servers in listed order:
NS1.BYET.ORG
NS2.BYET.ORG
NS3.BYET.ORG

Registry Status: clientDeleteProhibited
Registry Status: clientRenewProhibited
Registry Status: clientTransferProhibited
Registry Status: clientUpdateProhibited

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NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Alternate TLDs		
<input type="checkbox"/>	trumpbeijing.co	SAVE! \$12.99/yr
<input type="checkbox"/>	trumpbeijing.info	SAVE! \$2.89*/yr
<input type="checkbox"/>	trumpbeijing.net	SAVE! \$9.99*/yr
<input type="checkbox"/>	trumpbeijing.org	SAVE! \$6.99*/yr
<input type="checkbox"/>	trumpbeijing.ws	\$14.99/yr
<input type="checkbox"/>	trumpbeijing.us	SAVE! \$3.99/yr
<input type="checkbox"/>	trumpbeijing.ca	\$12.99/yr
<input type="checkbox"/>	trumpbeijing.biz	SAVE! \$5.99*/yr
Similar Premium Domains		
<input type="checkbox"/>	DiscountBeijing.com	\$1,648.00*
<input type="checkbox"/>	CheapBeijing.com	\$1,748.00*
<input type="checkbox"/>	BeijingChiropractors.com	\$448.00*
<input type="checkbox"/>	BeijingU.com	\$6,600.00*
<input type="checkbox"/>	BeijingArt.com	\$7,188.00*
<input type="checkbox"/>	BeijingBiz.com	\$2,988.00*
Similar Domains		
<input type="checkbox"/>	trumpbeijngs.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	theTrumpbeijing.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	trumpbeijngsita.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	mytrumpbeijing.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	trumpbeijingonline.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	newtrumpbeijing.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	trumpbeijingstore.com	SAVE! \$12.99*/yr
<input type="checkbox"/>	freetrumpbeijing.com	SAVE! \$12.99*/yr

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[Protected Registration](#)

*Plus ICANN fee of \$0.18 per domain name year.

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Enter a domain name to search

.com

Go Daddy Global

Language: English



Country: United States



Currency: United States Dollar \$ (Transactional)

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Account Settings
Customer Information
Order History
Create Account

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Product Catalog
Go Daddy Gear
Go Daddy Mobile
Deals of the Day

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WHOIS search
ICANN Confirmation
Affiliates
Follow & Fan Us
Legal
Commercial Contests
Site Map

Support

Telephone Support & Sales
Product Support
Discussion Forums
User Groups
Submit Support Ticket
Site Suggestions
Report Abuse
Go Daddy Scoop

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About Us
News Releases
Careers
Marketing Opportunities
Customer Testimonials
Security Center
.ME Scholarship
Round Up for Charity
Inside Go Daddy
Go Daddy Tech Center

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iPad Application
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A

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Username / Customer#

Password

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WHOIS Domain Check

Domains

Hosting & Servers

Storage

Web Design

Generate Income

Email

SSL & Security

Auctions

My Account

WHOIS search results for:

TRUMPINDIA.COM

(Registered)

Is this your
domain?

Add hosting, email and more.

Want to buy
this domain?

Get it with our Domain Buy service.

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registrant:
Web-adviser

556 E 88th St.
Brooklyn, New York 11236
United States

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
Domain Name: TRUMPINDIA.COM
Created on: 20-Sep-07
Expires on: 20-Sep-12
Last Updated on: 20-Sep-11

Administrative Contact:
Y., J. sporting202@yahoo.com
Web-adviser
556 E 88th St.
Brooklyn, New York 11236
United States
+1.6463098421

Technical Contact:
Y., J. sporting202@yahoo.com
Web-adviser
556 E 88th St.
Brooklyn, New York 11236
United States
+1.6463098421

Domain servers in listed order:
NS1.BYET.ORG
NS2.BYET.ORG
NS3.BYET.ORG

Registry Status: clientDeleteProhibited
Registry Status: clientRenewProhibited
Registry Status: clientTransferProhibited
Registry Status: clientUpdateProhibited

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NameMatch Recommendations

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Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> trumpindia.co	SAVE!	\$12.99/yr
<input type="checkbox"/> trumpindia.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> trumpindia.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> trumpindia.org	SAVE!	\$6.99*/yr
<input type="checkbox"/> trumpindia.ws		\$14.99/yr
<input type="checkbox"/> trumpindia.us	SAVE!	\$3.99/yr
<input type="checkbox"/> trumpindia.ca		\$12.99/yr
<input type="checkbox"/> trumpindia.biz	SAVE!	\$5.99*/yr

Similar Premium Domains

<input type="checkbox"/> IndieRegions.com		\$599.00*
<input type="checkbox"/> Southwesternindia.com		\$449.00*
<input type="checkbox"/> West-India.com		\$449.00*
<input type="checkbox"/> IndiaPC.com		\$1,750.00*
<input type="checkbox"/> Indiast.net		\$3,388.00*
<input type="checkbox"/> IndiaTV.net		\$4,830.00*

Similar Domains

<input type="checkbox"/> trumpindias.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> thetrumpindia.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> trumpindiaaste.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> mytrumpindia.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> trumpindiaonline.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> newtrumpindia.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> trumpindiastore.com	SAVE!	\$12.99*/yr
<input type="checkbox"/> freetrumpindia.com	SAVE!	\$12.99*/yr

Domains available at Go Daddy Auctions®:

<input type="checkbox"/> acetump.com	Ends on: 9/27/2012 12:00:00 AM PDT	\$32,500.00*
<input type="checkbox"/> trumpchavana.com	Ends on: 9/15/2012 8:00:00 AM PDT	\$20,001.00*
<input type="checkbox"/> rosietrump.com	Ends on: 9/13/2012 6:00:00 AM PDT	\$10,000.00*
<input type="checkbox"/> trumpforpresident.net	Ends on: 9/2/2012 12:00:00 AM PDT	\$20.00*
<input type="checkbox"/> thenetw orktrump.com	Ends on: 9/1/2012 7:00:00 PM PDT	\$1,000.00*
<input type="checkbox"/> trumpamerican.com	Ends on: 8/29/2012 9:00:00 AM PDT	\$100.00*

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*Plus ICANN fee of \$0.18 per domain name year.

**CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

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Country: United States



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WHOIS Domain Check

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Storage

Web Design

Generate Income

Email

SSL & Security

Auctions

My Account

WHOIS search results for:
TRUMPABUDHABI.COM
 (Registered)

Is this your domain?

Add hosting, email and more.

Want to buy this domain?

Get it with our Domain Buy service.

The data contained in GoDaddy.com, LLC's WHOIS database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registrant:
 Web-adviso

556 E 88th St.
 Brooklyn, New York 11236
 United States

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
 Domain Name: TRUMPABUDHABI.COM
 Created on: 27-Nov-07
 Expires on: 27-Nov-12
 Last Updated on: 28-Nov-11

Administrative Contact:
 Y., J. sporting202@yahoo.com
 Web-adviso
 556 E 88th St.
 Brooklyn, New York 11236
 United States
 +1.6463098421

Technical Contact:
 Y., J. sporting202@yahoo.com
 Web-adviso
 556 E 88th St.
 Brooklyn, New York 11236
 United States
 +1.6463098421

Domain servers in listed order:
 NS1.BYET.ORG
 NS2.BYET.ORG
 NS3.BYET.ORG

Registry Status: clientDeleteProhibited
 Registry Status: clientRenewProhibited
 Registry Status: clientTransferProhibited
 Registry Status: clientUpdateProhibited

[See Underlying Registry Data](#)
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NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> trumpabudhabi.co	SAVE	\$12.99/yr
<input type="checkbox"/> trumpabudhabi.info	SAVE	\$2.99*/yr
<input type="checkbox"/> trumpabudhabi.net	SAVE	\$9.99*/yr
<input type="checkbox"/> trumpabudhabi.org	SAVE	\$6.99*/yr
<input type="checkbox"/> trumpabudhabi.ws		\$14.99/yr
<input type="checkbox"/> trumpabudhabi.us	SAVE	\$3.99/yr
<input type="checkbox"/> trumpabudhabi.ca		\$12.99/yr
<input type="checkbox"/> trumpabudhabi.biz	SAVE	\$5.99*/yr

Similar Premium Domains

<input type="checkbox"/> MicroTrump.com		\$788.00*
<input type="checkbox"/> VanTrump.com		\$3,588.00*
<input type="checkbox"/> TrumpetMan.com		\$1,750.00*

Similar Domains

<input type="checkbox"/> trumpabudhabis.com	SAVE	\$12.99*/yr
<input type="checkbox"/> thetrumpabudhabi.com	SAVE	\$12.99*/yr
<input type="checkbox"/> trumpabudhabisite.com	SAVE	\$12.99*/yr
<input type="checkbox"/> mytrumpabudhabi.com	SAVE	\$12.99*/yr
<input type="checkbox"/> trumpabudhabionline.com	SAVE	\$12.99*/yr
<input type="checkbox"/> newtrumpabudhabi.com	SAVE	\$12.99*/yr
<input type="checkbox"/> trumpabudhabistore.com	SAVE	\$12.99*/yr
<input type="checkbox"/> freetrumpabudhabi.com	SAVE	\$12.99*/yr

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<input type="checkbox"/> rosietrump.com Ends on: 9/13/2012 6:00:00 AM PDT	\$10,000.00*
<input type="checkbox"/> sustainableabudhabi.com Ends on: 9/5/2012 1:44:00 PM PDT	\$199.00*
<input type="checkbox"/> trumpforpresident.net Ends on: 9/2/2012 12:00:00 AM PDT	\$20.00*
<input type="checkbox"/> thenetworktrump.com Ends on: 9/1/2012 7:00:00 PM PDT	\$1,000.00*

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